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Operator: AMEREN UE	Operator ID#: 20050
Inspection Date(s): 11/12/2013, 11/13/2013 (Half)	Man Days: 1.5
Inspection Unit: GOOSE CREEK	
Location of Audit: Olney	
Exit Meeting Contact: Mike Wendling	
Inspection Type: Standard Inspection Plan Review- O and M	
Pipeline Safety Representative(s): Charles Gribbins	
Company Representative to Receive Report: Jim Diemer, Michael Holman	
Company Representative's Email Address: jdiemer@ameren.com, mholman@ameren.com	

Mike Wendling	Gas Engineer	(618) 392-5502
Inspection Contact(s)	Title	Phone No.
	Email:	
	Phone#: (000) 000-0000	
Official or Mayor's Name:	Dave Wakeman	
	Fax#:	
	Emergency Phone#:	
	St. Louis, MO 63166	
Headquarters Address Information:	1901 Chouteau	

REPORTING PROCEDURES		Status
[192.605(b) (4)][191.5]	Does the operator's procedure require Telephonic Notices of Incidents reported to the NRC (800-424-8802)?	Satisfactory
General Comment:		
The procedures located in Section 8.3 Page 2 requires Telephonic I incident.	Notices of incidents reported to the NRC no later than 1 hour following of	discovery of an
[192.605(b) (4)][191.9(a)]	Does the operator's procedure require a DOT Incident Report Form 7100.1 submitted within 30 days after detection of an incident?	Not Applicable
General Comment:		
The operator's gas system does not contain distribution pipelines.		
[192.605(b) (4)][191.9(b)]	Does the operator's procedure require a supplemental incident report when deemed necessary? (Form F7100.1)	Not Applicable

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General Comment:		
The operator's gas system does not contain distribution pip	elines.	
[192.605(b) (4)][191.15(a)]	Does the operator's procedure require a DOT Incident Report Form 7100-2 submitted within 30 days after detection of an incident?	Satisfactory
General Comment:		
The operator's procedures located in Section 8.3, Page 2-3	includes the requirements for incident reports.	
[192.605(b) (4)][191.15(b)]	Does the operator's procedure require a supplemental incident report when deemed necessary? (Form F7100-2)	Satisfactory
General Comment:		
The operator's procedures located in Section 8.3, Page 3 in	ncludes the requirements for supplemental reports.	
[192.605(a)][191.25]	Does the operator's procedure require filing the SRCR within 5 days of determination, but not later than 10 days after discovery?	Satisfactory
General Comment:	<u> </u>	
The procedures located in Section 8.6, Pages 5-6 contain to	he requirements for filing the Safety Related Conditions Report.	
[192.605(d)][191.23]	Does the operator's procedure contain instructions to enable operation and maintenance personnel to recognize potential Safety Related Conditions?	Satisfactory
General Comment:		
The procedures located in Section 8.6, Pages 5-6 instruct p	personnel what conditions requires reporting and examples are given.	
[595.120.(a)]	Reports of Accidents: Does the operator have provisions for reporting accidents or damage to the ICC? (217-782-5050)	Satisfactory
General Comment:	<u> </u>	
The procedures located in Section 8.6, Pages 5- 6 includes	s provisions for reporting accidents or damages to the ICC.	
CUSTOMER NOTIFICATION	AND EFV INSTALLATION PROCEDURES	Status
Category Comment:		
The operator's gas system does not contain distribution pip	elines or services.	
[192.13(c)][192.16]	Does the operator have procedures for notifying new customers, within 90 days, of their responsibility for those sections of service not maintained by the operator?	Not Applicable
[192.13(c)][192.381]	Does the operator's procedure require that when EFVs are installed on single family residents that shall at a minimum meet the performance requirements of §192.381?	Not Applicable

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Unless otherwise noted, all code references are to 49CFR Part 192. If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

INSTALLATION OF TRANS	MISSION & DISTRIBUTION MAIN PIPE	Status
[192.13(c)][192.319]	Does the operator's procedure contain specifications for installation of transmission line or main in a ditch?	Satisfactory
General Comment:	·	
The procedures for transmission line installations are contain	ned in Section 7.5, Page 4.	
[192.13(c)][192.321]	Does the operator's procedure contain specifications for installation of plastic pipe in the ditch including a means of locating pipe?	Not Applicable
General Comment:	<u> </u>	•
The operator does not have any plastic pipe in the transmiss	sion system.	
[192.13(c)][192.323]	Does the operator's procedure contain casing requirements?	Satisfactory
General Comment:	·	
Section 14.2 pages 2-3		
[192.13(c)][192.325]	Does the operator's procedure contain underground clearance specifications?	Satisfactory
General Comment:	•	
The procedures for Pipeline Cover and Clearance are locate	ed in Section 7.5, Page 4 and include the clearance requirements.	
[192.13(c)][192.327]	Does the operator's procedure specify the amount of cover required for various types of installations?	Satisfactory
General Comment:	·	
The procedures for Pipeline Cover and Clearance are locate	ed in Section 7.5, Page 4 and include the clearance requirements	
[192.13(c)][192.321(g)]	Does the operator's procedure specify the time limitations for exposure to UV rays for PE pipe?	Not Applicable
General Comment:		
The operator does not use or keep plastic pipe in stock.		
SERVICE	LINE INSTALLATION	Status
Category Comment:		
The operator's transmission system does not contain distribu	ution piping.	
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as depth?	Not Applicable
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as support and backfill	Not Applicable
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as protection against strain and loading	Not Applicable
[192.13(c)][192.361]	Does the operator's procedure include service line	Not Applicable

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	installation standards such as installation of service line into a building	
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as installation of service line under a building	Not Applicable
[192.13(c)][192.365]	Does the operator's procedure address service line valve location?	Not Applicable
[192.13(c)][192.367]	Does the operator's procedure include specifications for service line connection to the main?	Not Applicable
CUSTOMER METERS	S AND REGULATORS	Status
Category Comment:		
The operator's transmission system does not contain distribution pip	ing.	
[192.13(c)][192.353]	Does the operator's procedure contain requirements for the location of meters and regulators?	Not Applicable
[192.13(c)][192.355]	Does the operator's procedure contain provisions to protect customer's meters and regulators from damage?	Not Applicable
[192.13(c)][192.357(a)]	Does the operator's procedure require each regulator and meter to be installed so as to minimize anticipated stresses upon the connecting piping and the meter?	Not Applicable
[192.13(c)][192.357(d)]	Does the operator's procedure require each regulator that might release gas in its operation to be vented to the outside atmosphere?	Not Applicable
NORMAL OPERATING AND N	MAINTENANCE PROCEDURES	Status
[192.605(a)]	Does the operator's procedure require the O&M Plan to be reviewed and updated at a minimum of 1 per year/15 months?	Satisfactory
General Comment:		
Section 6 pages 6 & 7		
Does the operator's procedure require the OQ Plan to Plan review at a minimum of 1 per year/15 months?	be reviewed and updated in connection with the O&M	Yes
Do procedures clearly include the name of the reviewe	r and dates of reviews?	Yes
[192.605(a)][192.605(b)(3)]	Does the operator's procedure require making construction records, maps, and operating history available to appropriate operating personnel?	Satisfactory
General Comment:		
USDI maintains operating history and maps of the transmission line,	but for construction records Ameren UE (Missouri) maintains these re	cord.
[192.605(a)][192.605(b)(5)]	Does the operator's procedure contain provisions for start up and shut down of a pipeline to assure operation within MAOP plus allowable buildup?	Not Applicable

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The operator stated that the MAOP meets or exceeds the MAC	P of the supplying transmission company.	
[192.605(a)][192.605(b)(8)]	Does the operator's procedure contain provisions for periodically reviewing the work done by operator's personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance and modifying the procedures when deficiencies are found?	Satisfactory
General Comment:		
Section 6 pages 6 & 7		
[192.605(a)][192.605(b)(9)]	Does the operator's procedure contain provisions taking for adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapors or gas, and making available when needed at the excavation, emergency rescue equipment, including a breathing apparatus and a rescue harness and line? If not, then does the plan include prohibiting personnel from entering excavated trenches that may be hazardous?	Not Applicable
General Comment:		
The operators plan indicates that no work will occur in a gaseou	us atmosphere. Section 14.1 page 2	
ABNORMAL OPERATING P	ROCEDURES FOR TRANSMISSION	Status
[192.605(a)][192.605(c)(1)(i)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of unintended closure of valves or shut downs?	Satisfactory
General Comment:		
Section 4 subsection 4.4 Abnormal Operations, pages 2-5		
	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of increase or decrease in pressure or flow rate outside of normal operating limits?	Satisfactory
	responding to, investigating, and correcting the cause of increase or decrease in pressure or flow rate	Satisfactory
[192.605(a)][192.605(c)(1)(ii)]	responding to, investigating, and correcting the cause of increase or decrease in pressure or flow rate	Satisfactory
[192.605(a)][192.605(c)(1)(ii)] General Comment: Section 4 subsection 4.4 Abnormal Operations, pages 2-5	responding to, investigating, and correcting the cause of increase or decrease in pressure or flow rate	Satisfactory
[192.605(a)][192.605(c)(1)(ii)] General Comment:	responding to, investigating, and correcting the cause of increase or decrease in pressure or flow rate outside of normal operating limits? Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause	

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General Comment:	prosont diass totation:	
[192.605(a)][192.609]	Does the operator's procedure contain provisions for conducting a class location survey whenever an increase in populations density indicates a change in class location or a segment of an existing steel pipeline operating at a hoop stress that is more than 40 percent of SMYS, or indicates that the hoop stress corresponding to the established MAOP for a segment of existing pipeline is not commensurate with the present class location?	Satisfactory
	LASS LOCATION PROCEDURES	Status
Section 4 subsection 4.4 Abnormal Operations, pages	32-5	
General Comment:		
[192.605(a)][192.605(c)(4)]	Does the operator's procedure contain provisions for periodically reviewing the response of operating personnel to determine the effectiveness of the procedures and taking corrective action where deficiencies are found?	Satisfactory
General Comment: Section 4 subsection 4.4 Abnormal Operations, pages	s 2-5 and Section 9 of the plan.	
[192.605(a)][192.605(c)(3)]	Does the operator's procedure contain provisions for notifying the responsible operating personnel when notice of an abnormal operation is received?	Satisfactory
Section 4 subsection 4.4 Abnormal Operations, pages		
General Comment:		
[192.605(a)][192.605(c)(2)]	Does the operator's procedure contain provisions for checking variations from normal operation after abnormal operations ended at sufficient critical locations?	Satisfactory
Section 4 subsection 4.4 Abnormal Operations, pages	\$ 2-5	
General Comment:		
[192.605(a)][192.605(c)(1)(v)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of any other foreseeable malfunction of a component, deviation from normal operations or personnel error?	Satisfactory
Section 4 subsection 4.4 Abnormal Operations, pages	s 2-5	
General Comment:		
[192.605(a)][192.605(c)(1)(iv)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of the operation of any safety device?	Satisfactory

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Section 6.8 K. page 18		
[192.605(a)][192.611]	In the event a change in class location becomes necessary does the manual contain procedures for confirmation or revision of the MAOP?	Satisfactory
General Comment:		
Section 6.8 K. page 18		
CONTINUING SU	RVEILLANCE PROCEDURES	Status
[192.613(a)]	Does the operator's procedure include requirements for continuing surveillance of facilities to determine and take appropriate action concerning class location changes, failures, leak history, corrosion, cathodic protection requirements, and other unusual operating conditions?	Satisfactory
General Comment:		
Section 6.8 page 18		
[192.613(a)][192.613(b)]	Does the operator's procedure include requirements for reducing the MAOP, or other actions to be taken, if a segment of pipeline is in unsatisfactory condition?	Satisfactory
General Comment:		
Section 6.8 page 18		
[192.613(a)][192.459]	Does operator have procedures for determining if exposed cast iron was examined for evidence of graphitization and, if necessary, were remedial actions taken?	Not Applicable
General Comment:		
The operator does not have any cast iron pipe in the transf	mission system.	
[192.613(a)][192.489]	Does the operator's procedure include requirements for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leak history, or any other unusual operating maintenance conditions?	Not Applicable
General Comment:		
The operator does not have any cast iron pipe in the transi	mission system.	
DAMAGE PREVEN	TION PROGRAM PROCEDURES	Status
[192.605(a)][192.614(c)(1)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- identifies persons who engage in excavating?	Satisfactory
General Comment:		

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Section 6.7 see Paradigm report for this information.		
[192.605(a)][192.614(c)(2)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- provides notification to the public in the One Call area?	Satisfactory
General Comment:		
Section 6.7 Damage Prevention page 16 & 17		
[192.605(a)][192.614(c)(3)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- provides means for receiving and recording notifications of pending excavations?	Satisfactory
General Comment:		
Section 6.7 Damage Prevention page 16 & 17		
[192.605(a)][192.614(c)(4)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- provides notification of pending excavations to the members?	Satisfactory
General Comment:		
Section 6.7 Damage Prevention page 16 & 17		
[192.605(a)][192.614(c)(5)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- provides means of temporary marking for the pipeline in the vicinity of the excavations?	Satisfactory
General Comment:	·	
Section 6.7 Damage Prevention page 16 & 17		
[192.605(a)][192.614(c)(6)(i)]	Does the operator's procedure provide for follow-up inspection of the pipeline where there is reason to believe the pipeline could be damaged- Inspection must be done to verify integrity of the pipeline?	Satisfactory
General Comment:	•	
Section 6.7 Damage Prevention page 16 & 17		
[192.605(a)][192.614(c)(6)(ii)]	Does the operator's procedure provide for follow-up inspection of the pipeline where there is reason to believe the pipeline could be damaged- After blasting, a leak survey must be conducted as part of the inspection by the operator?	Satisfactory
General Comment:	<u> </u>	
Section 6.7 Damage Prevention page 16 & 17		

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Has the Operator adopted the applicable	Common Ground Alliance Best Practices?	Yes
dangers posed by directional drilling and operevention program shall include actions	Does the operator have adequate directional fective actions to protect their underground facilities from the other trenchless technology? A pipeline operator's damage to protect their facilities when directional drilling operations are sees procedures should include, but are not limited to, accurately g personnel qualifications?	Yes
[IL ADM. CO.265.100(b)]	Does the operator have procedures to report third party damage to mains, when a release of gas occurs, reported to ICC JULIE Enforcement?	Satisfactory
General Comment:		
Section 6.7 Damage Prevention page G. 16 & 17		
ЕМЕ	ERGENCY PROCEDURES	Status
[192.615(a)(9)]	Does the operator have procedures for restoring service outages after the emergency has been rendered safe?	Satisfactory
General Comment:	·	
Section 9, 9.12 page 10 Restoration to Service.		
[192.615(a)(1)]	Does the operator have procedures for receiving, identifying, and classifying notices of events which require immediate response by the operator?	Satisfactory
General Comment:	<u>.</u>	
Section 9, 9.1 General page 3		
[192.615(a)(2)]	Does the operator have procedures for establishing and maintaining communication with appropriate public officials regarding possible emergency?	Satisfactory
General Comment:		
Section 9, 9.16 Liaison with public officials page 12		
[192.615(a)(3)(i)]	Does the operator have procedures for prompt response to gas detected inside or near a building?	Not Applicable
General Comment:		
At the present time there are no residents or building	gs along the pipeline that would be in close proximity to the line.	
[192.615(a)(3)(ii)]	Does the operator have procedures for prompt response to a fire located near a pipeline?	Satisfactory
General Comment:		
Section 9, 9.7 Fires involving or threatening pipeline	facilities. page 6	
[192.615(a)(3)(iii)]	Does the operator have procedures for prompt	Satisfactory

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	response to an explosion near a pipeline?	
General Comment:		
Section 9, 9.8 Explosions page 6 & 7.		
[192.615(a)(3)(iv)]	Does the operator have procedures for prompt response to natural disasters?	Satisfactory
General Comment:	•	
Section 9, 9.9 Natural Disasters, pages 7 & 8		
[192.615(a)(4)]	Does the operator have procedures for the availability of personnel, equipment, instruments, tools, and material required at the scene of an emergency?	Satisfactory
General Comment:		
Section 9, 9.14 Emergency Equipment & Tools	page 11	
[192.615(a)(5)]	Does the operator have procedures for actions directed towards protecting people first, then property?	Satisfactory
General Comment:		
Section 9, 9.1 General page 3		
[192.615(a)(6)]	Does the operator have procedures for emergency shutdown or pressure reduction to minimize hazards to life or property?	Satisfactory
General Comment:		
Section 9, 9.5 Initial response to emergency not	ification. page 5	
[192.615(a)(7)]	Does the operator have procedures to require making safe any actual or potential hazard to life or property?	Satisfactory
General Comment:		
Section 9 pages 3-5		
[192.615(a)(8)]	Does the operator have procedures requiring the notification of appropriate public officials required at the emergency scene and coordinating planned and actual responses with these officials?	Satisfactory
General Comment:		
The procedures for coordination at the scene of	an emergency with public officials, emergency responders, and employees are located in S	Section 9.16 Page 12.
[192.615(a)(10)]	Does the operator have procedures for investigating accidents and failures as soon as possible after the emergency?	Satisfactory
General Comment:		
The incident and emergency investigation and r	eporting requirements are located in Section 9.13 Pages 10-11.	
[192.615(b)(1)]	Does the operator have procedures for furnishing	Satisfactory

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	applicable partiage of the emergency plan to	
	applicable portions of the emergency plan to supervisory personnel who are responsible for emergency action?	
General Comment:		
The procedures for providing the emergency plan to personnel wi	no are engaged in emergency action are located in Section 9.2, Pages 3-	4.
[192.615(b)(2)]	Does the operator have procedures for training appropriate employees as to the requirements of the emergency plan and verifying effectiveness of training?	Satisfactory
General Comment:	•	
The procedure for training personnel concerning all aspects of the	e emergency plan are located in Section 9.15 Page 12.	
[192.615(b)(3)]	Does the operator have procedures for reviewing employee activities to determine whether the procedures were effectively followed in each emergency?	Satisfactory
General Comment:		
The procedures to determine if procedures were followed during a	an emergency are located in Section 9, 9.12 Pages 9-10.	
[192.615(c)]	Does the operator have procedures to establish and maintain liaison with appropriate public officials, such that both the operator and public officials are aware of each other's resources and capabilities in dealing with gas emergencies?	Satisfactory
General Comment:		
The procedures for coordination at the scene of an emergency wi	th public officials, emergency responders, and employees are located in S	Section 9.16 Page 12
Does the operator have procedures for leaks caused whether the procedures adequately address the posinto nearby buildings?	by excavation damage near buildings and determine sibility of multiple leaks and underground migration of gas	Yes
General Comment:		
See Section 6, 6.4 Leak Complaints for information related to this	section.	
FAILURE INVESTIG	GATION PROCEDURES	Status
[192.617]	Does the operator have procedures for analyzing accidents and failures, including laboratory analysis where appropriate, to determine cause and prevention of recurrence?	Satisfactory
General Comment:		
See section 9.13 Investigation of Failures.		
MAOP P	ROCEDURES	Status
[192.605(a)][192.621]	Does the operator have procedures for establishing the MAOP for High Pressure Distribution Systems?	Not Applicable

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General Comment:		
The operator's system does not contain High Pressure Dis	stribution Systems.	
[192.605(a)][192.623]	Does the operator have procedures for establishing the Minimum and Maximum Allowable Operating Pressure Low Pressure Distribution Systems?	Not Applicable
General Comment:	·	
The operator's system does not contain Distribution pipeli.	ines.	
[192.605(a)][192.619(a)(1)]	Is MAOP determined by design and test? or	Satisfactory
General Comment:	·	
The MAOP was determined by pressure testing. Section 3	3.2	
[192.605(a)][192.619(a)(2)]	Does the operator have procedures requiring the MAOP to be determined by test pressure divided by applicable factor?	Satisfactory
General Comment:		
The MAOP was determined by pressure testing. Section 3	3.2	
[192.605(a)][192.619(a)(3)]	Does the operator have procedures requiring the MAOP to be determined by highest operating pressure to which the segment of line was subjected between July 1, 1965 and July 1, 1970?	Not Applicable
General Comment:	·	
The operator's MAOP was determined by construction tes	st pressure.	
[192.605(a)][192.619(a)(4)]	Does the operator have procedures requiring the MAOP to be determined by the maximum safe pressure determined by operator?	Not Applicable
General Comment:	<u> </u>	
The operator's MAOP was determined by construction tes	st pressure.	
[192.605(a)][192.619(b)]	Does the operator have procedures requiring overpressure devices be installed if .619 (a) (4) is applicable?	Not Applicable
General Comment:		
There are no overpressure devices install because the MA	AOP is either the same or above the MAOP of the delivering transmission line.	
PRESSURE TEST PROCEDURES		Status
[192.13(c)]	Does the plan allow for the use of pre-tested pipe for repairs?	Satisfactory
General Comment:		
Pre-tested pipe for repairs is found in Section 7.2 Page 2.		
[192.13(c)][192.503(a)(1)]	Does the operator's procedure prohibit operating a	Satisfactory

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	new segment of pipeline, or return to service a segment of pipeline that has been relocated or replaced, until it is pressure tested in accordance with this subpart and §192.619 to substantiate the maximum allowable operating pressure; and	
General Comment:		
Section 7.1 page 2		
[192.13(c)][192.503(a)(2)]	Does the operator's procedure prohibit operating a new segment of pipeline, or return to service a segment of pipeline that has been relocated or replaced, until all potentially hazardous leaks have been located and eliminated?	Satisfactory
General Comment:		
Section 7.1 page 2		
[192.13(c)][192.503(b)(1),192.503(b)(2),192.503(b)(3)]	Does the operator's procedure indicate that, for a new segment of pipeline, or a segment of pipeline that has been relocated or replaced, the pressure test medium must be liquid, air, natural gas, or inert gas that is compatible with the material of which the pipeline is constructed, relatively free of sedimentary materials, and except for natural gas, nonflammable?	Satisfactory
General Comment:		
Section 7.2 page 2		
[192.13(c)][192.503(d)]	Does the operator's procedure indicate that each joint used to tie in a test segment of pipeline is excepted from the specific test requirements of this subpart, but each non-welded joint must be leak tested at not less than its operating pressure?	Satisfactory
General Comment:		
Section 7.2 page 3		
[192.13(c)][192.505(b)]	Except for service lines, Does the operator's procedure include requirements for strength testing of pipe to operate at a hoop stress of 30% of SMYS or more which are based on class location?	Satisfactory
General Comment:		
Section 7.2 page 2-3.		
[192.13(c)][192.505(c)]	Except for service lines, Does the operator's procedure include requirements for strength testing of pipe to operate at a hoop stress of 30% of SMYS or more to be tested at or above the required test pressure for at least 8 hour?	Satisfactory
General Comment:		

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Section 7.2 page 2-3.		
[192.13(c)][192.505(d)]	Except for service lines, Does the operator's procedure include requirements for strength testing of pipe to operate at a hoop stress of 30% of SMYSs or more for replacement components if not certified by manufacturer?	Satisfactory
General Comment:		
Section 7.2 page 2-3.		
[192.13(c)][192.505(e)]	Except for service lines, Does the operator's procedure include requirements for fabricated units and short sections of pipe which operates at a hoop stress of 30% or more of SMYS and for which a post installation test is impractical, that a pre-installation strength test must be conducted by maintaining the pressure for at least 4 hours?	Satisfactory
[192.13(c)][192.507]	Does the operator's procedure include requirements for testing pipelines, which operate at a hoop stress less than 30% of SMYS and at or above 100 psig?	Not Applicable
General Comment:	·	
The Operator's line operators above 30% SMYS.		
[192.13(c)][192.509(b)]	Does the operator's procedure include requirements for testing steel main which operate below 100 psig at a minimum of 10 psig for main that operates below 1 psig and for each steel main to operate below 100 psig test to a minimum of 90 psig for main that operates over 1 psig?	Not Applicable
General Comment:		
The Operator's line operators above 30% SMYS.		
[192.13(c)][192.511(b)]	Does the operator's procedure include test requirements for service lines other than plastic which specify minimum test pressure as follows: 50 psig if the line operates over 40 psig?	Not Applicable
General Comment:		
The Operator's line operators above 30% SMYS.		
[192.13(c)][192.511(c)]	Does the operator's procedure include test requirements for service lines other than plastic which specify minimum test pressure of 90 psig if the line operates over 40 psig, unless the service line is stressed to 20% or more SMYS then testing must be conducted in accordance with 192.507?	Not Applicable
General Comment:	operates over 40 psig, unless the service line is stressed to 20% or more SMYS then testing must be	Not Ap

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The Operator's line operators above 30% SMYS.		
[192.13(c)][192.513(c)]	Does the operator's procedure include test requirements for plastic pipelines of 150% of MOP or 50 psig whichever is greater?	Not Applicable
General Comment:	•	
The Operator's line operators above 30% SMYS.		
[192.13(c)][192.517(a)(1)]	Does the plan require test records for pipelines that operate over 100 psig that include: Operators name, responsible employee's name, name of testing company?	Satisfactory
General Comment:		
Section 7.3 pages 3-4.		
[192.13(c)][192.517(a)(2)]	Does the plan require test records for pipelines that operate over 100 psig that include test medium?	Satisfactory
General Comment:	•	
Section 7.3 pages 3-4.		
[192.13(c)][192.517(a)(3)]	Does the plan require test records for pipelines that operate over 100 psig that include test pressure?	Satisfactory
General Comment:		
Section 7.3 pages 3-4.		
[192.13(c)][192.517(a)(4)]	Does the plan require test records for pipelines that operate over 100 psig that include test duration?	Satisfactory
General Comment:		
Section 7.3 pages 3-4.		
[192.13(c)][192.517(a)(5)]	Does the plan require test records for pipelines that operate over 100 psig that include pressure recording charts of readings?	Satisfactory
General Comment:		
Section 7.3 pages 3-4.		
[192.13(c)][192.517(a)(7)]	Does the plan require test records for pipelines that operate over 100 psig that include leaks and failures noted?	Satisfactory
General Comment:	·	
Section 7.3 pages 3-4.		
ODORIZATION of GAS PROCEDURES		Status
Category Comment:		
The transmission line lies in all class one locations and the	ne gas is not odorized.	

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[192.605(a)][192.625(a)]	Does the operator's procedure include a requirement	Not Applicable
[400 005/-\][400 005/h\]	that distribution lines must contain odorized gas?	11
[192.605(a)][192.625(b)]	Does the operator's procedure require odorized gas in Class 3 or 4 locations (if applicable)?	Not Applicable
[192.605(a)][192.625(f)]	Does the operator's procedure require periodic gas sampling, using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable?	Not Applicable
TAPPING PIPELINES UNI	DER PRESSURE PROCEDURES	Status
[192.605(a)][192.627]	Does the operator's procedure require that hot taps be made by a qualified crew?	Satisfactory
General Comment:		
See section 14.3 page 60 manual kept this machines		
PIPELINE PUR	GING PROCEDURES	Status
Category Comment:		
Section 4.5 Purging		
[192.605(a)][192.629(a)]	Do the operator's procedures require that purging of pipelines must be done to prevent entrapment of an explosive mixture in the pipeline lines containing air must be properly purged?	Satisfactory
[192.605(a)][192.629(b)]	Do the operator's procedures require that purging of pipelines must be done to prevent entrapment of an explosive mixture in the pipeline lines containing gas must be properly purged?	Satisfactory
MAINTENAN	ICE PROCEDURES	Status
[192.605(a)][192.703(b)]	Does the operator's procedure require that each segment of pipeline that becomes unsafe must be replaced, repaired, or removed from service?	Satisfactory
General Comment:	•	
Section 7.1 General page 2		
[192.605(a)][192.703(c)]	Does the operator's procedure require that hazardous leaks must be repaired promptly?	Satisfactory
General Comment:		
Section 7.1 General page 2		
TRANSMISSION LINES - PATROLL	ING & LEAKAGE SURVEY PROCEDURES	Status
[192.605(b)][192.705(a)]	Does the operator's procedure require patrolling of surface conditions on and adjacent to transmission line right of way for indications of leak, construction activities, and other factors affecting safety and operations?	Satisfactory

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General Comment:		
Section 6.2 page 4		
[192.605(b)][192.705(b)]	Does the operator's procedure require that the frequency of patrols is to be determined by the size of the line, the operating pressures, the class location, terrain, weather, and other relevant factors, but intervals between patrols may not be longer than prescribed in .705(b)?	Satisfactory
General Comment:		
Section 6.2 page 4		
[192.605(b)][192.706]	Does the operator's procedure require leakage surveys at a minimum of 1 year/15 months	Satisfactory
General Comment:		
Section 6.3 page 4		
[192.605(b)][192.706(a)]	Does the operator's procedure include leak detector equipment survey requirements for transmission lines transporting un-odorized gas in Class 3 locations 7½ months but at least twice each calendar year?	Satisfactory
General Comment:		
Section 6.3 page 4		
[192.605(b)][192.706(b)]	Does the operator's procedure include leak detector equipment survey requirements for lines transporting un-odorized gas in Class 4 locations - 4½ months but at least 4 times each calendar year?	Not Applicable
General Comment:		
The transmission line is in a class one location.		
DISTRIBUTION SYSTEM PAT	ROLLING & LEAKAGE SURVEY PROCEDURES	Status
Category Comment:		
The operator's gas system does not contain distribution	on pipelines or services.	
[192.605(b)][192.721(a)]	Does the operator's procedure require the frequency of patrolling mains to be determined by the severity of the conditions which could cause failure or leakage?	Not Applicable
[192.605(b)][192.721(b)(1)]	Does the operator's procedure require that mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled in business districts at intervals not exceeding 4½ months, but at least four times each calendar year? and	Not Applicable
[192.605(b)][192.721(b)(2)]	Does the operator's procedure require that mains in places or on structures where anticipated physical	Not Applicable

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	movement or external loading could cause failure or leakage must be patrolled outside business districts at intervals not exceeding 7½ months, but at least twice each calendar year?	
[192.605(b)][192.723(b)(1)]	Does the operator's procedure require periodic leak surveys determined by the nature of the operations and conditions, and be performed with leak detector equipment in business districts as specified, 1/yr (15 months)?	Not Applicable
[192.605(b)][192.723(b)(2)]	Does the operator's procedure require periodic leak surveys determined by the nature of the operations and conditions, and be performed with leak detector equipment outside of business districts as specified, once every 5 calendar years/63 mos.; for unprotected lines subject to .465(e) where electrical surveys are impractical, once every 3 years/39 mos.	Not Applicable
LINE	MARKER PROCEDURES	Status
[192.605(b)][192.707]	Does the operator's procedure require that line markers be installed and labeled as required?	Satisfactory
General Comment:		
The procedures for Pipeline Markers are located in S	Section 4.6 Page 6 and include the appropriate locations for placement and labeling req	quirements.
TRANSMISSION	N RECORD KEEPING PROCEDURES	Status
[192.605(b)][192.709(a)]	Does the operator's procedure require that records must be maintained on repairs to the pipe for the life of the system?	Satisfactory
General Comment:		
The operator's procedure requiring that records mus	at be maintained on repairs to the pipe for the life of the system are located in Section 1.	.5 Page 7.
[192.605(b)][192.709(b)]	Does the operator's procedure require that records must be maintained on repairs to "other than pipe" for 5 years?	Satisfactory
1		
General Comment:		
	st be maintained on repairs to the pipe for the life of the system are located in Section 1.	.5 Page 7.
	Does the operator's procedure require that records must be maintained for Operation (Sub L) and Maintenance (Sub M) patrols, surveys, tests for 5 years or until next completion of the next inspection cycle?	5 Page 7. Satisfactory

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TRANSMISSIO	N FIELD REPAIR PROCEDURES	Status
[192.605(b)][192.713(a)(1)]	Does the operator's procedure require that each imperfection or damage that impairs the serviceability of pipe in a steel transmission line operating at or above 40 percent of SMYS must be removed by cutting out and replacing a cylindrical piece of pipe; OR must be repaired by a method that reliable engineering tests and analyses show can permanently restore the serviceability of the pipe?	Satisfactory
General Comment:		
Section 14.4 page 60 the operator chose to take the li	ne out of service to make repairs.	
[192.605(b)][192.713(b)]	Does the operator's procedure require that the operating pressure must be at a safe level during repair operations?	Satisfactory
General Comment:	•	
Section 14.4 page 60 the operator chose to take the lin	ne out of service to make repairs.	
[192.605(b)][192.715(a)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 if the segment of transmission line is taken out of service?	Not Applicable
General Comment:		
The operator's procedure require that each weld that is §192.245 if the segment of transmission line is taken of	s unacceptable under §192.241(c) must be repaired in accordance with the applicabl out of service located in Section 14.2 Page 58.	e requirements of
[192.605(b)][192.715(b)(1)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 while the segment of transmission line is in service if the weld is not leaking?	Not Applicable
General Comment:		
The operator does not make repairs on the pipeline wh	nen it is in service, stated in Section 14.4 Page 60.	
[192.605(b)][192.715(b)(2)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 while the segment of transmission line is in service if the pressure is reduced to produce a stress that is 20% of SMYS?	Not Applicable
General Comment:		
The operator does not make repairs on the pipeline wh	nen it is in service, stated in Section 14.4 Page 60.	

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[192.605(b)][192.715(b)(3)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 while the segment of transmission line is in service if the grinding is limited so that 1/8 inch thickness of pipe weld remains?	Not Applicable
General Comment:		
The operator does not make repairs on the pipeline when	n it is in service, stated in Section 14.4 Page 60.	
[192.605(b)][192.715(c)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) and cannot be repaired in accordance with .715(a) or .715(b) then a full encirclement welded split sleeve of appropriate design must be installed?	Not Applicable
General Comment:		
The operator does not make repairs on the pipeline when sleeve.	n it is in service, stated in Section 14.4 Page 60. The operator does not use full en	circlement welded split
[192.605(b)][192.717(a)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made by removing the leak by cutting out and replacing a cylindrical piece of pipe? OR	Satisfactory
General Comment:		
The operator does not make repairs on the pipeline when	n it is in service, stated in Section 14.4 Page 60.	
[192.605(b)][192.717(b)(1)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made by installing a full encirclement welded split sleeve of appropriate design, unless the transmission line is joined by mechanical couplings and operates at less than 40 percent of SMYS? OR	Not Applicable
General Comment:		
The operator does not make repairs on the pipeline when	n it is in service, stated in Section 14.4 Page 60.	
[192.605(b)][192.717(b)(2)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made by installing a properly designed bolt-on-leak clamp if the leak is due to a corrosion pit? OR	Not Applicable
General Comment:	,	
The operator does not make repairs on the pipeline when	n it is in service, stated in Section 14.4 Page 60.	
[192.605(b)][192.717(b)(3)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line	Not Applicable

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General Comment: The operator does not make repairs on the pipeline when it	must be made if the leak is due to a corrosion pit and on pipe of not more than 40,000 psi (267 Mpa) SMYS, fillet weld over the pitted area a steel plate patch with rounded corners, of the same or greater thickness than the pipe, and not more than one-half of the diameter of the pipe in size? OR is in service, stated in Section 14.4 Page 60.	
[192.605(b)][192.717(b)(4)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made if the leak is on a submerged pipeline in inland navigable waters, mechanically apply a full encirclement split sleeve of appropriate design? OR	Not Applicable
General Comment:		
The operator does not have any submerged pipelines in inla	and navigable water.	
[192.605(b)][192.717(b)(5)]	Does the operator's procedure require that each permanent field repair of a leak on a transmission line must be made by applying a method that reliable engineering tests and analyses show can permanently restore the serviceability of the pipe?	Not Applicable
General Comment:		
The operator does not make repairs on the pipeline when it	is in service, stated in Section 14.4 Page 60.	
[192.605(b)][192.719(a)]	Does the operator's procedure require that replacement pipe must be pressure tested to meet the requirements of a new pipeline?	Satisfactory
General Comment:		
Section 14.2 Page 58.		
[192.605(b)][192.719(b)]	Does the operator's procedure require that for lines of 6-inch diameter or larger and that operate at 20% of more of SMYS, the repair must be nondestructively tested in accordance with §192.241(c)?	Satisfactory
General Comment:	'	
Section 14.2 Page 58.		
TEST REQUIREMENTS	FOR REINSTATING SERVICE LINES	Status
Category Comment:		
There are no service lines on the transmission line.		

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[192.605(b)][192.725(a)]	Does the operator's procedure require that disconnected service lines must be tested the same as a new service line?	Not Applicable
[192.605(b)][192.725(b)]	Does the operator's procedure require that service lines that are temporarily disconnected must be tested from the point of disconnection, the same as a new service line, before reconnect?	Not Applicable
ABANDONMENT or DEAC	CTIVATION of FACILITIES PROCEDURES	Status
[192.605(b)][192.727(b)]	Does the operator's procedure require disconnecting both ends, purge, and seal each end before abandonment or a period of deactivation where the pipeline is not being maintained?	Satisfactory
General Comment:		
Section 7.4 Abandonment Procedures		
[192.605(b)][192.727(c)]	Does the operator's procedure require that, except for service lines, each inactive pipeline that is not being maintained under Part 192 must be disconnected from all gas sources/supplies, purged, and sealed at each end?	Satisfactory
General Comment:		
Section 7.4 Abandonment Procedures		
[192.605(b)][192.727(d)(1)]	Does the operator's procedure require that whenever service to a customer is discontinued the valve that is closed to prevent the flow of gas to the customer must be provided with a locking device or other means designed to prevent the opening of the valve by persons other than those authorized by the operator? OR	Not Applicable
General Comment:		
The operator's system does not contain services.		
[192.605(b)][192.727(d)(2)]	Does the operator's procedure require that whenever service to a customer is discontinued a mechanical device or fitting that will prevent the flow of gas must be installed in the service line or in the meter assembly? OR	Not Applicable
General Comment:		
The operator's system does not contain services.		
[192.605(b)][192.727(d)(3)]	Does the operator's procedure require that whenever service to a customer is discontinued the customer's piping must be physically disconnected from the gas supply and the open pipe ends sealed?	Not Applicable
General Comment:		

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The operator's system does not contain services.		
[192.605(b)][192.727(e)]	Does the operator's procedure require that if air is used for purging, the operator shall ensure that a combustible mixture is not present after purging?	Satisfactory
General Comment:		
Section 4.5 Purging		
[192.605(b)][192.727(g)]	Does the operator's procedure require that the operator must file reports upon abandoning underwater facilities crossing commercially navigable waterways, including offshore facilities?	Not Applicable
General Comment:		
The operator's system does not cross any commercially navigab	le waterways	
COMPRESSOR S	TATION PROCEDURES	Status
Category Comment:		
The operator does not have compressor stations.		
[192.605(b)(7)][192.605(b)(6)]	Does the operator's procedure include provisions for isolating units or sections of pipe and for purging before returning to service?	Not Applicable
[192.605(b)(7)][192.605(b)(7)]	Does the operator's procedure require starting, operating, and shutdown procedures for gas compressor units?	Not Applicable
[192.605(b)(7)][192.731]	Does the operator's procedure require inspection and testing for remote control shutdowns and pressure relieving devices at a minimum of 1 per yr/15 months), prompt repair or replacement?	Not Applicable
[192.605(b)(7)][192.735(a)]	Does the operator's procedure require storage of excess flammable or combustible materials at a safe distance from the compressor buildings?	Not Applicable
[192.605(b)(7)][192.735(b)]	Does the operator's procedure require above ground storage tanks to be protected according to NFPA #30; Amdt 192-103 pub. 06/09/06 eff. 07/10/06?	Not Applicable
[192.605(b)(7)][192.736(a)(1)]	Does the operator's procedure require that compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless: 50% of the upright side areas are permanently open? OR	Not Applicable
[192.605(b)(7)][192.736(a)(2)]	Does the operator's procedure require compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless: It is an unattended field compressor station of 1000 hp or less?	Not Applicable

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PRESSURE LIMITING	and REGULATING STATION PROCEDURES	Status
Category Comment:		
The operator has the same MAOP or higher operation	ing pressure as the transmission company and does not require pressure limiting or pre	essure regulation.
[192.605(b)][192.739(a)(1)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is in good mechanical condition?	Not Applicable
[192.605(b)][192.739(a)(2)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is adequate from the standpoint of capacity and reliability of operation for the service in which it is employed	Not Applicable
[192.605(b)][192.739(a)(3)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is set to control or relieve at correct pressures consistent with .201(a), except for .739(b).	Not Applicable
[192.605(b)][192.739(a)(4)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is properly installed and protected from dirt, liquids, and other conditions that may prevent proper operation.	Not Applicable
[192.605(b)][192.739(b)]	Does the operator's procedure require steel pipelines whose MAOP is determined under §192.619(c), if the MAOP is 60 psi (414 kPa) gauge or more, the control or relief pressure limit is as required by .739 (b).	Not Applicable
[192.605(b)][192.741(a)]	Does the operator's procedure require telemetering or recording pressure gauges to be in place to indicate gas pressure in the district that is supplied by more than one regulating station?	Not Applicable
[192.605(b)][192.741(b)]	Does the operator's procedure require the operator to determine the need in a distribution system supplied by only one district station?	Not Applicable
[192.605(b)][192.741(c)]	Does the operator's procedure require the operator to inspect equipment and take corrective measures when there are indications of abnormally high or low pressure?	Not Applicable
[192.605(b)][192.743(a)]	Does the operator's procedure require that capacity must be consistent with .201(a) except for .739(b), and	Not Applicable

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	be determined at a minimum of 1 per yr/15 months?	
[192.605(b)][192.743(b)]	If the capacities are calculated, Does the operator's procedure require them to be compared with the rated or experimentally determined relieving capacity of the device for the conditions under which it operates?	Not Applicable
[192.605(b)][192.743(c)]	Does the operator's procedure require new or additional devices be installed to provide required capacity if insufficient capacity exists?	Not Applicable
VALVE AND VAU	ILT MAINTENANCE PROCEDURES	Status
[192.605(b)][192.745(a)]	Does the operator's procedure require that each transmission valve that might be required during an emergency is inspected and partially operated at a minimum of 1 per year/15 months?	Satisfactory
General Comment:	•	
Section 6.1 page 3		
[192.605(b)][192.745(b)]	Does the operator's procedure require that prompt remedial action will be taken to correct any transmission valve found inoperable, unless the operator designates an alternative valve?	Satisfactory
General Comment:	·	
Section 6.1 page 3		
[192.605(b)][192.747(a)]	Does the operator's procedure require that each distribution valve that might be required during an emergency is checked and serviced at a minimum of 1 per year/15 months?	Not Applicable
General Comment:	•	
The operator's system does not contain distribution val	lves.	
[192.605(b)][192.747(b)]	Does the operator's procedure require that prompt remedial action will be taken to correct any valve found inoperable, unless the operator designates an alternative valve?	Not Applicable
General Comment:	·	
The operator's system does not contain distribution val	lves.	
[192.605(b)][192.749]	Does the operator's procedure require that vaults greater than 200 cubic feet must be inspected at a minimum of 1 per year/15 months?	Not Applicable
General Comment:		
The operator's system does not contain any vaults.		
DDEVENTION (A)	CCIDENTAL IGNITION PROCEDURES	Status

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Category Comment:		
Section 2.3 Pages 4-5		
[192.605(b)][192.751(a)]	Does the operator's procedure require that when a hazardous amount of gas is being vented into open air, each potential source of ignition must be removed from the area and a fire extinguisher must be provided?	Satisfactory
[192.605(b)][192.751(b)]	Does the operator's procedure prohibit gas or electric welding or cutting on pipe or on pipe components that contain a combustible mixture of gas and air in the area of work?	Satisfactory
[192.605(b)][192.751(c)]	Does the operator's procedure require that warning signs will be posted, where appropriate?	Satisfactory
CAULKED BELL AND SPICE	GOT JOINTS PROCEDURES	Status
Category Comment: The operator does not have any cast iron in the transmission system.	n.	
[192.605(b)][192.753(a)]	Does the operator's procedure require that each cast iron caulked bell and spigot joint that is subject to pressures of more than 25 psi gage must be sealed with mechanical clamp, or sealed with material/device which does not reduce flexibility, permanently bonds, and seals and bonds as prescribed in §192.753(a)(2)(iii)?	Not Applicable
[192.605(b)][192.753(b)]	Does the operator's procedure require that when cast iron bell and spigot subject to 25 psig or less, joints, when exposed for any reason, must be sealed by means other than caulking?	Not Applicable
PROTECTING CAST-IROI	N PIPELINE PROCEDURES	Status
Category Comment: The operator does not have any cast iron in the transmission system.	n.	
[192.605(b)][192.755(a)(1)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from vibrations from heavy construction equipment, trains, trucks, buses or blasting?	Not Applicable
[192.605(b)][192.755(a)(2)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from impact forces by vehicles?	Not Applicable

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segment of a buried cast-iron pipeline is disturbed must provide protection from earth movement? 192.605(b)][192.755(a)(4)]			
operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from apparent future excavations near the pipeline? [192.605(b)][192.755(a)(5)] Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from other foreseeable outside forces which might subject the segment of pipeline to a bending stress? [192.605(b)][192.755(b)] Does the operator's procedure require the operator to a bending stress? Does the operator's procedure require the operator to a bending stress? WELDING AND WELD DEFECT REPAIR/REMOVAL PROCEDURES	[192.605(b)][192.755(a)(3)]	operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed	Not Applicable
Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from other foreseeable outside forces which might subject the segment of pipeline to a bending stress? [192.605(b)][192.755(b)] Does the operator's procedure require the operator to as soon as feasible; provide permanent protection for the disturbed segment from external loads? WELDING AND WELD DEFECT REPAIR/REMOVAL PROCEDURES Status [192.13(c)][192.225(a)] Does the operator's procedure require their welding procedures to be qualified under Section 5 of API 1104 or Section 1X of ASME Boiler and Pressure Code by destructive test? Satisfactory General Comment: Section 14.2 Pages 2-3 [192.13(c)][192.225(b)] Does the operator's procedure require each welding procedure to be recorded in detail, including the results of the qualifying tests? Satisfactory Satisfactory Satisfactory Satisfactory Satisfactory Satisfactory Does the operator's procedure require their welders be qualified Section 6 of API 1104 or Section IX of ASME Boiler and Pressure Code? Satisfactory Satisfactory Does the operator's procedure require their welders be qualified Section 6 of API 1104 or Section IX of ASME Boiler and Pressure Code? Satisfactory Satisfactory	[192.605(b)][192.755(a)(4)]	operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from apparent future	Not Applicable
as soon as feasible; provide permanent protection for the disturbed segment from external loads? WELDING AND WELD DEFECT REPAIR/REMOVAL PROCEDURES [192.13(c)][192.225(a)] Does the operator's procedure require their welding procedures to be qualified under Section 5 of API 1104 or Section IX of ASME Boiler and Pressure Code by destructive test? Section 14.2 Pages 2-3 [192.13(c)][192.225(b)] Does the operator's procedure require each welding procedure to be recorded in detail, including the results of the qualifying tests? Section 14.2 Pages 2-3 [192.13(c)][192.227(a)] Does the operator's procedure require their welders be qualified Section 6 of API 1104 or Section IX of ASME Boiler and Pressure Code? Satisfactory Satisfactory Satisfactory Satisfactory Does the operator's procedure require their welders be qualified Section 6 of API 1104 or Section IX of ASME Boiler and Pressure Code? Satisfactory	[192.605(b)][192.755(a)(5)]	operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from other foreseeable outside forces which might subject the segment of pipeline to	Not Applicable
Does the operator's procedure require their welding procedures to be qualified under Section 5 of API 1104 or Section IX of ASME Boiler and Pressure Code by destructive test? General Comment: Section 14.2 Pages 2-3	[192.605(b)][192.755(b)]	as soon as feasible; provide permanent protection for	Not Applicable
procedures to be qualified under Section 5 of API 1104 or Section IX of ASME Boiler and Pressure Code by destructive test? General Comment: Section 14.2 Pages 2-3	WELDING AND WELD D	EFECT REPAIR/REMOVAL PROCEDURES	Status
Does the operator's procedure require each welding procedure to be recorded in detail, including the results of the qualifying tests? General Comment: Section 14.2 Pages 2-3	[192.13(c)][192.225(a)]	procedures to be qualified under Section 5 of API 1104 or Section IX of ASME Boiler and Pressure Code	Satisfactory
Does the operator's procedure require each welding procedure to be recorded in detail, including the results of the qualifying tests? General Comment: Section 14.2 Pages 2-3 [192.13(c)][192.227(a)] Does the operator's procedure require their welders be qualified Section 6 of API 1104 or Section IX of ASME Boiler and Pressure Code? General Comment: Section 14.2 Pages 2-3 [192.13(c)][192.227(b)] Does the operator's procedure require their welders be qualified under Section I of Appendix C to weld on lines that operate at <20% SMYS? General Comment:	General Comment:	•	
procedure to be recorded in detail, including the results of the qualifying tests? General Comment: Section 14.2 Pages 2-3	Section 14.2 Pages 2-3		
[192.13(c)][192.227(a)] Does the operator's procedure require their welders be qualified Section 6 of API 1104 or Section IX of ASME Boiler and Pressure Code? General Comment: Section 14.2 Pages 2-3 [192.13(c)][192.227(b)] Does the operator's procedure require their welders be qualified under Section I of Appendix C to weld on lines that operate at <20% SMYS? General Comment:	[192.13(c)][192.225(b)]	procedure to be recorded in detail, including the	Satisfactory
Does the operator's procedure require their welders be qualified Section 6 of API 1104 or Section IX of ASME Boiler and Pressure Code? General Comment: Section 14.2 Pages 2-3 [192.13(c)][192.227(b)] Does the operator's procedure require their welders be qualified under Section I of Appendix C to weld on lines that operate at <20% SMYS? General Comment:	General Comment:	•	
qualified Section 6 of API 1104 or Section IX of ASME Boiler and Pressure Code? Section 14.2 Pages 2-3 [192.13(c)][192.227(b)] Does the operator's procedure require their welders be qualified under Section I of Appendix C to weld on lines that operate at <20% SMYS? General Comment: Satisfactory Satisfactory	Section 14.2 Pages 2-3		
Section 14.2 Pages 2-3 [192.13(c)][192.227(b)] Does the operator's procedure require their welders be qualified under Section I of Appendix C to weld on lines that operate at <20% SMYS? General Comment: Satisfactory	[192.13(c)][192.227(a)]	qualified Section 6 of API 1104 or Section IX of ASME	Satisfactory
[192.13(c)][192.227(b)] Does the operator's procedure require their welders be qualified under Section I of Appendix C to weld on lines that operate at <20% SMYS? General Comment: Satisfactory	General Comment:	•	
qualified under Section I of Appendix C to weld on lines that operate at <20% SMYS? General Comment:	Section 14.2 Pages 2-3		
	[192.13(c)][192.227(b)]	qualified under Section I of Appendix C to weld on	
Section 14.2 Pages 2-4	General Comment:		
	Section 14.2 Pages 2-4		

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Unless otherwise noted, all code references are to 49CFR Part 192. If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

[192.13(c)][192.229(a)]	Does the operator's procedure require a welder to successfully complete a destructive test to weld on compressor station piping and components?	Not Applicable
General Comment:		
The operator does not have any compressor station	piping and components.	
[192.13(c)][192.229(b)]	Does the operator's procedure require no welder may weld with a particular welding process unless, within the preceding 6 months, he has engaged in welding with that process?	Satisfactory
General Comment:		
Section 14.2 Pages 2-4		
[192.13(c)][192.229(c)(1)]	Does the operator's procedure require a welder qualified under .227(a) may not weld on pipe that operates at> 20% SMYS unless within the preceding 6 calendar months the welder has had one weld tested and found acceptable under the sections 6 or 9 of API Standard 1104?	Satisfactory
General Comment:	·	
Section 14.2 Pages 2-4		
[192.13(c)][192.229(c)(2)]	Does the operator's procedure require a welder qualified under .227(a) may not weld on pipe that operates at < 20% SMYS unless the welder is tested in accordance with .229(c) (1) or requalifies under .229(d) (1) or (d) (2)?	Satisfactory
General Comment:		
Section 14.2 Pages 2-4		
[192.13(c)][192.229(d)(1)]	Does the operator's procedure require that an Appendix C welder be re-qualified within 1 year/15 months? OR	Satisfactory
General Comment:		
Section 14.2 Pages 2-4		
[192.13(c)][192.229(d)(2)]	Does the operator's procedure require that an Appendix C welder be re-qualified within 7 1/2 months but at least twice per calendar year and has met the requirements of .229(d)(i)(ii)?	Satisfactory
General Comment:	·	
Section 14.2 Pages 2-4		
[192.13(c)][192.231]	Does the operator's procedure require that welding operations must be protected from weather conditions that would impair the quality of the completed weld?	Satisfactory

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Unless otherwise noted, all code references are to 49CFR Part 192. If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

Does the operator's procedure require that miter joints be made in accordance with this section?	Satisfactory
Does the operator's procedure require proper welding surface preparation and joint alignment?	Satisfactory
Does the operator's procedure require that visual inspection must be conducted by an individual qualified by appropriate training and experience to ensure compliance with the welding procedure?	Satisfactory
Does the operator's procedure require that visual inspection must be conducted by an individual qualified by appropriate training and experience to ensure that the weld is acceptable in accordance with Section 9 of API 1104?	Satisfactory
Does the operator's procedure require that welds on pipelines to be operated at 20% or more of SMYS must be nondestructively tested in accordance with 192.243, except welds that are visually inspected and approved by a qualified welding inspector if the nominal pipe diameter is less than 6 inches? OR	Satisfactory
Does the operator's procedure require that welds on pipelines to be operated at 20% or more of SMYS must be nondestructively tested in accordance with 192.243, except a pipeline that is to operate at a pressure that produces a hoop stress of less than 40% of SMYS and the welds are so limited in number that nondestructive testing is impractical?	Not Applicable
	Does the operator's procedure require proper welding surface preparation and joint alignment? Does the operator's procedure require that visual inspection must be conducted by an individual qualified by appropriate training and experience to ensure compliance with the welding procedure? Does the operator's procedure require that visual inspection must be conducted by an individual qualified by appropriate training and experience to ensure that the weld is acceptable in accordance with Section 9 of API 1104? Does the operator's procedure require that welds on pipelines to be operated at 20% or more of SMYS must be nondestructively tested in accordance with 192.243, except welds that are visually inspected and approved by a qualified welding inspector if the nominal pipe diameter is less than 6 inches? OR Does the operator's procedure require that welds on pipelines to be operated at 20% or more of SMYS must be nondestructively tested in accordance with 192.243, except a pipeline that is to operate at a pressure that produces a hoop stress of less than 40% of SMYS and the welds are so limited in number that

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Unless otherwise noted, all code references are to 49CFR Part 192. If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

All welds to be non-destructively tested, Section 14.2 Page 58		
[192.13(c)][192.241(c)]	Does the operator's procedure require that the acceptability of a weld, which is based on nondestructively tested or visually inspected, is determined according to the standards in Section 9 of API Standard 1104?	Satisfactory
General Comment:		
Section 14.2 Page 58		
[192.13(c)][192.245(a)]	Does the operator's procedure require that each weld that is unacceptable must be removed or repaired?	Satisfactory
General Comment:		
Section 14.2 Page 58		
[192.13(c)][192.245(b)]	Does the operator's procedure require that each weld that is repaired must have the defect removed down to sound metal, and the segment to be repaired must be preheated if conditions exist which would adversely affect the quality of the weld repair?	Satisfactory
General Comment:		
Section 14.2 Page 58		
[192.13(c)][192.245(c)]	Does the operator's procedure require that repair of a crack or any other defect in a previously repaired area must be in accordance with a written weld repair procedure qualified under §192.225?	Satisfactory
General Comment:		
Section 14.2 Page 58-60.		
Discuss with the operator regarding the use of a low h	ydrogen process when welding a sleeve for repair.	Not Applicable
General Comment:		
The operator does not use repair sleeves.		
TRANSMISSION NONDESTRU	ICTIVE TESTING PROCEDURES	Status
[192.13(c)][192.243(a)]	Does the operator's procedure require that nondestructive testing of welds must be performed by any process, other than trepanning, that clearly indicates defects that may affect the integrity of the weld?	Satisfactory
General Comment:		
Section 14		
[192.13(c)][192.243(b)(1)]	Does the operator's procedure require that nondestructive testing of welds must be performed in accordance with written procedures?	Satisfactory

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General Comment:		
Section 14		
[192.13(c)][192.243(b)(2)]	Does the operator's procedure require that nondestructive testing of welds must be performed by persons who have been trained and qualified in the established procedures and with the equipment employed in testing?	Satisfactory
General Comment:		
Section 14		
[192.13(c)][192.243(c)]	Does the operator's procedure require that procedures must be established for the proper interpretation of each nondestructive test of a weld to ensure the acceptability of the weld under §192.241(c)?	Satisfactory
General Comment:		
Section 14		
[192.13(c)][192.243(d)(1)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference In Class 1 locations at least 10 percent?	Not Applicable
General Comment:		
The operator O&M Manual require all welds to be r	non-destructively tested. Section 14	
[192.13(c)][192.243(d)(2)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference in Class 2 locations at least 15 percent?	Not Applicable
General Comment:		
The operator O&M Manual require all welds to be r	non-destructively tested. Section 14	
[192.13(c)][192.243(d)(3)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference in Class 3 and Class 4 locations, at crossings of major or navigable rivers, offshore, and within railroad or public highway rights-of-way, including tunnels, bridges, and overhead road crossings, 100% unless impracticable, then 90%?	Not Applicable
General Comment:		

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Unless otherwise noted, all code references are to 49CFR Part 192. If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

The operator O&M Manual require all welds to be not	n-destructively tested. Section 14	
[192.13(c)][192.243(d)(4)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference at pipeline tie-ins, 100 %?	Not Applicable
General Comment:		
The operator O&M Manual require all welds to be no	n-destructively tested. Section 14	
[192.13(c)][192.243(e)]	Does the operator's procedure require that a sample of each welder's work for each day must be nondestructively tested, when nondestructive testing is required under §192.241(b), except for a welder whose work is isolated from the principal welding activity?	Satisfactory
General Comment:	·	
The operator O&M Manual require all welds to be not	n-destructively tested. Section 14	
[192.13(c)][192.243(f)]	Does the operator's procedure require that the operator must retain, for the life of the pipeline, a record showing by mile post, engineering station, or by geographic feature, the number of welds nondestructively tested, the number of welds rejected, and the disposition of the rejected welds?	Satisfactory
General Comment:	•	
Section 14.2 page 58		
JOINING of PIPELINE MATER	RIALS OTHER THAN BY WELDING PROCEDURES	Status
Category Comment:		
The operator only uses steel piping and it is all welde	ed except for flange fittings.	
[192.273(b)][192.283(b)]	Does the operator have qualified joining procedures for mechanical joints?	Satisfactory
[192.281(a)][192.281(a)]	Does the operator's procedure prohibit joining plastic pipe by threaded or miter joint?	Not Applicable
[192.273(b)][192.283(a)]	Does the operator have qualified joining procedures for heat fusion, solvent cement, and adhesive joints?	Not Applicable
[192.273(b)][192.283(c)]	Does the operator's procedure require that persons making and inspecting joints must have available a copy of the qualified joining procedure?	Not Applicable
[192.273(b)][192.285(a)]	Does the operator's procedure require that person making joints with plastic pipe must be qualified?	Not Applicable
[192.273(b)][192.285(b)(1)]	Does the operator's procedure require the specimen joint to be visually examined during and after	Not Applicable

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Unless otherwise noted, all code references are to 49CFR Part 192. If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

	·	
	assembly or joining?	
[192.273(b)][192.285(b)(2)]	Does the operator have procedures requiring when a specimen joint used for personnel qualification in the case of a heat fusion, solvent cement, or adhesive joint be tested under any one of the qualified test methods?	Not Applicable
[192.273(b)][192.285(c)]	Does the operator have procedures that require a person to be requalified if during any 12 month period that person does not make any joints or has 3 joints or 3% of joints, whichever is greater, found to be unacceptable?	Not Applicable
[192.273(b)][192.285(d)]	Does the operator have a method to determine that each person making joints on plastic pipelines is qualified?	Not Applicable
[192.273(b)][192.287]	Does the operator's procedure require that person inspecting plastic pipe joints must be qualified by appropriate training or experience to evaluate plastic pipe joints?	Not Applicable
CORROSION CON	TROL PROCEDURES	Status
[192.605(b)][192.453]	Does the operator's procedure require that corrosion control procedures required by .605(b)(2), including those for the design, installation, operation, and maintenance of cathodic protection systems, must be carried out by, or under the direction of, a person qualified in pipeline corrosion control methods?	Satisfactory
General Comment: The procedure located in Section 5 Page 3 requires the person insignation.	pecting must be qualified in pipeline corrosion control methods.	
[192.605(b)][192.455(a)]	Does the operator's procedure require that pipelines installed after July 31, 1971, buried segments must be externally coated and cathodically protected within one year after completion of construction? (see exceptions in code)	Satisfactory
General Comment:		
All lines that were installed were coated as required by this section,	Section 5 Page 2.	
[192.605(b)][192.455(e)]	Does the operator's procedure require that aluminum may not be installed in a buried or submerged pipeline if that aluminum is exposed to an environment with a natural pH in excess of 8, unless tests or experience indicate its suitability in the particular environment involved?	Not Applicable
General Comment: The operator's system does not contain aluminum.	•	

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Unless otherwise noted, all code references are to 49CFR Part 192. If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

[192.605(b)][192.457(a)]	Does the operator's procedure require that all effectively coated steel transmission pipelines installed prior to August 1, 1971, must be cathodically protected?	Not Applicable
General Comment:		
This transmission line was installed after 1971.		
[192.605(b)][192.457(b)]	Does the operator's procedure require that cathodic protection must be provided in areas of active corrosion for bare or ineffectively coated transmission lines, and bare or coated compressor station piping, regulator station, meter station piping, and (except for cast iron or ductile iron) bare or coated distribution lines installed before August 1, 1971?	Not Applicable
General Comment:		
Section 5.2 page 3		
[192.605(b)][192.479(b)]	Does the operator's procedure require coating material to be suitable for the prevention of atmospheric corrosion?	Satisfactory
General Comment:		
Section 5.1 page 2		
[192.605(b)][192.459]	Does the operator's procedure require that whenever an operator has knowledge that any portion of a buried pipeline is exposed, the exposed portion must be examined for evidence of external corrosion if the pipe is bare, or if the coating is deteriorated and remedial actions taken when required?	Satisfactory
General Comment:		
Section 5.5 page 6		
[192.605(b)][192.461(a),192.461(b)]	Does the operator's procedure address the external protective coating requirements of the regulations?	Satisfactory
General Comment:		
Section 5.1 pages 2-3.		
[192.605(b)][192.463]	Does the operator's procedure require cathodic protection levels that comply with one or more applicable criteria contained in Appendix D?	Satisfactory
General Comment:		
Section 5.3 page 5		
[192.605(b)][192.465(a)]	Does the operator's procedure require pipe-to-soil monitoring at a minimum of 1 per year/15 months and for separately protected short sections of main and	Satisfactory

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Unless otherwise noted, all code references are to 49CFR Part 192. If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

	transmission main or separately protected service lines require monitoring of 10% of the system to be surveyed annually?	
General Comment:		
Section 5.4 page 5		
[192.605(b)][192.465(b)]	Does the operator's procedure require rectifier monitoring be conducted at a minimum of 6 per year/2 1/2 months?	Not Applicable
General Comment:		
The operator does not maintain any rectifiers on the transmission lin	e.	
[192.605(b)][192.465(c)]	Does the operator's procedure require critical interference bond monitoring be conducted at a minimum of 6 per year/2 1/2 months and non-critical bond monitoring be conducted at a minimum of 1 per year/15 months?	Not Applicable
General Comment:		
There are no interference bonds on the pipeline. Section 5.4 page 6		
[192.605(b)][192.465(d)]	Does the operator's procedure require that prompt remedial action to correct any deficiencies indicated by the monitoring?	Satisfactory
General Comment:		
Section 5.4 page 6.		
[192.605(b)][192.465(e)]	Does the operator's procedure require electrical surveys on bare and unprotected lines at a minimum of once per 3 years/39 months and must cathodically protect active corrosion areas, if found?	Not Applicable
General Comment:		
The operator does not have any bare or unprotected lines.		
[192.605(b)][192.467(a)]	Does the operator's procedure require that each buried or submerged pipeline be electrically isolated from other underground metallic structures, unless interconnected?	Satisfactory
General Comment:		
Section 5.4 page 6-7		
[192.605(b)][192.467(b)]	Does the operator's procedure require that one or more insulating devices must be installed where electrical isolation of a portion of a pipeline is necessary to facilitate the application of corrosion control?	Satisfactory

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Unless otherwise noted, all code references are to 49CFR Part 192. If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

General Comment:		
Section 5.2 page 4		
[192.605(b)][192.467(c)]	Does the operator's procedure require that each pipeline must be electrically isolated from metallic casings that are a part of the underground system?	Satisfactory
General Comment:		
Section 5.4 page		
[192.605(b)][192.467(d)]	Does the operator's procedure require that inspection and electrical tests must be made to assure that electrical isolation is adequate?	Satisfactory
General Comment:		
Section 5 page 4		
[192.605(b)][192.469]	Does the operator's procedure define how a sufficient number of test stations or contact points for electrical measurement are established to determine the adequacy of cathodic protection?	Satisfactory
General Comment:		
Section 5 page 4		
[192.605(b)][192.471]	Does the operator's procedure define how test leads will be installed and maintained?	Satisfactory
General Comment:		
Section 5.8 pages 7 & 8		
[192.605(b)][192.473(a)]	Does the operator's procedure require the determination of how interference currents are affecting the cathodic protection system?	Not Applicable
General Comment:		
The operator does not have any interference currents on their pipel.	ine.	
[192.605(b)][192.473(b)]	Does the operator's procedure require the determination that impressed current type cathodic protection system or galvanic anode system are designed and installed to minimize any adverse effects on existing adjacent underground metallic structures?	Not Applicable
General Comment:		
The operator does not have any underground metallic structures ne	ear the transmission line.	
[192.605(b)][192.475(a)]	Does the operator's procedure require that if corrosive gas is transported by pipeline, the corrosive effect of the gas on the pipeline must be investigated and steps taken to minimize internal corrosion?	Satisfactory

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Unless otherwise noted, all code references are to 49CFR Part 192. If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

General Comment:		
Section 5.5 page 6. The operator does not transport	t any corrosive gas.	
[192.605(b)][192.475(b)]	Does the operator's procedure require that whenever any pipe is removed from a pipeline for any reason, the internal surface must be inspected for evidence of corrosion?	Satisfactory
General Comment:		
Section 5.5 page 6		
[192.605(b)][192.475(b)(1)]	Does the operator's procedure require that when internal corrosion is observed that the adjacent pipe will be inspected for internal corrosion?	Satisfactory
General Comment:		
Section 5.5 page 6		
[192.605(b)][192.475(b)(2)]	Does the operator's procedure require replacement of pipe when internal corrosion is observed to the extent required by the applicable paragraphs of §§192.485, 192.487, or 192,489?	Satisfactory
General Comment:		
Section 5.5 page 6		
[192.605(b)][192.475(b)(3)]	Does the operator's procedure require the steps that must be taken when internal corrosion is discovered?	Satisfactory
General Comment:		
Section 5.5 page 6		
[192.605(b)][192.476(a)]	Does the operator's procedure require features incorporated into its design and construction of transmission lines installed after May 23, 2007, to reduce internal corrosion?	Not Applicable
General Comment:		
The operator pipe was installed before 2007 and the	e operator does not plan to install any other pipe at this time.	
[192.605(b)][192.477]	Does the operator's procedure require, if corrosive gas is being transported, the use of internal corrosion control coupons, or other suitable means of monitoring at a minimum of 2 per year/7 1/2 months?	Not Applicable
General Comment:		
The operator does not plan to transport any corrosiv	ve gas.	

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Unless otherwise noted, all code references are to 49CFR Part 192. If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

[192.605(b)][192.479(a)]	Does the operator's procedure require each exposed pipe, including soil-to-air interface, to be cleaned and coated?	Satisfactory
General Comment:	·	
Section 5.1 pages 2-3		
[192.605(b)][192.481(a)]	Does the operator's procedure require atmospheric corrosion control monitoring at a minimum of 1 per 3 years/39 months?	Satisfactory
General Comment:	·	
Section 5.5 page 7		
[192.605(b)][192.481(b)]	Does the operator's procedure require particular attention to atmospheric corrosion on exposed pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water?	Satisfactory
General Comment:	·	
Section 5.1 pages 2-3		
[192.605(b)][192.481(c)]	Does the operator's procedure require protection be provided if atmospheric corrosion is discovered?	Satisfactory
General Comment:	·	
Section 5.1 pages 2-3		
[192.605(b)][192.483]	Does the operator's procedure require that replacement pipe be coated and cathodically protected?	Satisfactory
General Comment:		
Section 5.1 pages 2-3		
[192.605(b)][192.485(a)]	Does the operator have procedures to replace or repair transmission pipe, or reduce the operating pressure if general corrosion has reduced the wall thickness?	Satisfactory
General Comment:	·	
Section 5.7 page 7		
[192.605(b)][192.485(b)]	Does the operator have procedures to replace or repair transmission pipe, or reduce the operating pressure if localized corrosion has reduced the wall thickness?	Satisfactory
General Comment:		
Section 5.7 page 7 & Section 5.5 page 6		
[192.605(b)][192.485(c)]	Does the operator's procedure require the use of	Satisfactory

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	Rstreng or B-31G to determine the remaining wall	
	strength?	
General Comment:		
Section 5.7 page 7		
[192.605(b)][192.487(a)]	Does the operator have procedures to replace or repair distribution pipe if general corrosion has reduced the wall thickness?	Not Applicable
General Comment:		
The operator does not have distribution piping.		
[192.605(b)][192.487(b)]	Does the operator have procedures to replace or repair distribution pipe if localized corrosion has reduced the wall thickness?	Not Applicable
General Comment:		
The operator does not have distribution piping.		
[192.605(b)][192.489(a)]	Does the operator have procedures to replace pipe if general graphitization is discovered on cast or ductile iron pipe?	Not Applicable
General Comment:	•	
The operator does not cast iron in the system.		
[192.605(b)][192.489(b)]	Does the operator have procedures to repair or replace pipe or seal by internal sealing methods when localized graphitization is discovered on cast or ductile iron pipe?	Not Applicable
General Comment:		
The operator does not cast iron in the system.		
[192.605(b)][192.491(a)]	Does the operator have procedures requiring the retention of records and maps to show the location of cathodically protected pipe, facilities, anodes, and bonded structures?	Satisfactory
General Comment:		
Section 1.5 page 7		
[192.605(b)][192.491(b)]	Does the operator have procedures requiring the retention of records under .491(a) for the life of the pipeline?	Satisfactory
General Comment:		
Section 1.5 page 7		
[192.605(b)][192.491(c)]	Does the operator have procedures that require the retention of testing, surveys, or inspections records which detail the adequacy of the corrosion control	Satisfactory

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	measures for a minimum of 5 years?	
General Comment:	•	
Section 1.5 page 7		
l	JPRATING PROCEDURES	Status
Category Comment:		
The operator's plan states no further uprating is p	planned. Section 3.2 page 3	
[192.13(c)][192.553(a)(1)]	Does the operator's procedure include uprating requirements which meet Subpart K and include pressure raised in increments?	Not Applicable
[192.13(c)][192.553(a)(1)]	Does the operator's procedure include uprating requirements which meet Subpart K and include section checked before further pressure increase?	Not Applicable
[192.13(c)][192.553(a)(2)]	Does the operator's procedure include uprating requirements which meet Subpart K and include hazardous leaks repaired between increments?	Not Applicable
[192.13(c)][192.553(b)]	Does the operator's procedure include uprating requirements which meet Subpart K and include records kept for life of system?	Not Applicable
TRAINING		Status
[520.10(a)(1)]	Does the operator's procedure contain adequate descriptions of types of training each job classification requires, including those of field foreman, field crew leaders, leak inspectors, new construction inspectors, servicemen and corrosion technicians and/or equivalent classifications?	Satisfactory
General Comment:	·	
The training is the same for all employees.		
[520.10(a)(2)]	Does the operator's procedure include scheduling of verbal instruction and/or on-the-job training for each job classification?	Satisfactory
General Comment:		
Utility Safety & Design, Inc. Operation Qualification	on Manual Section V Section 13 of the O&M Manual	
[520.10(a)(3)]	Does the operator's procedure include provisions for evaluating the performance of personnel to assure their competency in performing the work assigned to them?	Satisfactory
General Comment:	•	

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[520.10(a)(4)]	Does the operator's procedure include subject matter relating to recognition of potential hazards, and actions to be taken toward prevention of accidents?	Satisfactory
General Comment:	·	
Utility Safety & Design, Inc. Operation Quali	fication Manual Section V Section 13 of the O&M Manual	
[520.10(a)(5)]	Are the operator's procedures periodically updated to include new materials, new methods of operation and installation, and changes in general procedures?	Satisfactory
General Comment:		
Utility Safety & Design, Inc. Operation Quali	fication Manual Section V Section 13 of the O&M Manual	
[520.10(a)(6)]	Are the operator's procedures made a part of the gas system's operation, inspection and maintenance plan, and filed with the Commission?	Satisfactory
[520.10(b)]	Does the operator's procedure require that the operator/personnel (municipal/master meter) attend regularly scheduled instructional courses held by utility companies or participate in courses such as the IGT Gas Distribution Home Study Course, or programs developed and presented by community colleges, vocational schools, universities, consultants or other recognized gas distribution oriented agencies?	Not Applicable
General Comment:	•	
This section is for municipals and master me	eter operators.	
[520.10(a)]	Does the operator's procedure specify methods to be used for training, including frequency and subject matter of training?	Satisfactory
General Comment:	ification Manual Section V Section 12 of the ORM Manual	
Utility Safety & Design, Inc. Operation Quali	fication Manual Section V Section 13 of the O&M Manual	

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